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## **By ECF Filing**

The Hon. Douglas E. Arpert, U.S.M.J. Clarkson S. Fisher Building & U.S. Courthouse 402 East State Street, Courtroom 6W Trenton, New Jersey 08608

Re: CC Ford Group West, LLC v. Johnson, Project Velocity, Inc., et al. 3:22-cv-04143 — Subpoena to Verizon Wireless

Dear Judge Arpert:

This law firm represents Plaintiff CC Ford Group West, LLC ("Plaintiff" or "CCFW"), and Counterclaim Defendant John Studdiford in this matter. We write to advise you that today we are issuing a Subpoena for documents to Verizon Wireless requesting text communications and talk logs for four (4) line numbers under Defendant Jennifer Johnson's Verizon Account. We have learned that in the past few days Defendant Johnson requested that Verizon suspend one of her lines. While we do not want to be in violation of the Court's order staying the matter, Plaintiff is concerned that these records will not be maintained by Verizon. Plaintiff has no objection to waiting for the deposition or documents, but we want Verizon to put a litigation hold on the records so that, if the matter does not settle at mediation, the records will still be available.

Respectfully submitted,

JANINE N. MATTON

Is Janine N. Matton

Cc: All Counsel of Record via ECF